

Revisions Made to the Draft Air Quality Permit Kennecott Eagle Minerals Company (KEMC)

As a results of the comments received during the public comment period and at the public hearings, the Air Quality Division (AQD) made the following changes to draft air use permit No. 50-06 before it was issued on December 14, 2007 –

- In response to concerns about how NO_x emission should be calculated during the first 180 days of operation of the three diesel generators, the emission limits table for FGGENERATORS in the final Air Use Permit was modified to require the use of the vendor emission factor (6.95g/bhp-hr) or the most recent test data to calculate the NO_x emissions.
- In response to concerns that the draft Air Permit failed to specify the type of “fuel oil” that my burned in the three generators at the facility, special condition Nos. 1.2, 1.9 (previously 1.8), and 1.13 (previously 1.12) were modified to only allow No. 2 fuel oil to be burned. The draft permit was reviewed upon the assumption that only No. 2 fuel oil would be burned.
- AQD added special condition No. 1.5 to the final permit. This condition requires that the operation of the three diesel generators comply with the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60 Subparts A and IIII. This condition was inadvertently not included in the draft permit by AQD.
- In response to the many concerns raised throughout the public comment period and at the public hearings concerning the PM-10 emissions from the mine ventilation air rise (MVAR) stack, Kennecott amended their Air Use permit application to include control of the MVAR stack using a fabric filter system. This change in design is reflected in Emission Unit Table included on page 6 of the final Air Use Permit. As a result of this change, the allowed inorganic PM emissions allowed in special condition No. 9.1a have been reduced from the original limit of 0.0024 lbs per 1000 lbs of exhaust gases to 0.00036 lbs per 1000 lbs of exhaust gases. In addition, the allowed inorganic PM-10 emissions allowed in special condition No. 9.1b have been reduced from the original limit of 4.6 pounds per hour to 0.7 pounds per hour. Also as a result of this change, AQD has added special conditions Nos. 9.3 and 9.4 to the final permit. Special condition No. 9.3 requires that Kennecott submit to the Air Quality Division for its approval a malfunction abatement plan and a preventative maintenance plan for the fabric filter system. Special condition No. 9.4 requires that Kennecott not operate the MVAR unless the fabric filter system is also installed and operating properly. It should be noted that the original uncontrolled emissions from the MVAR meet all applicable State and federal air quality rules and regulations. As such, the permit would have been approvable without control on the MVAR.

- Kennecott also indicated that they would increase the MVAR stack height from the originally proposed 49.2 feet to 65 feet. As a result of this change, the minimum MVAR stack height has been changed in both special condition No. 2.7a and 9.9 (previously 9.7) from the original height of 49.2 feet to 65.0 feet.
- Kennecott commented that special condition No. 10.4 in the draft Air Use Permit which limited the number of ore trucks entering and leaving the facility per 12-month rolling time period contained an error. The limit included in the draft permit was a maximum equivalent of 1400 50-ton trucks. The correct value that should have been included in special condition No. 10.4 is 16,856 trucks entering and leaving the facility per 12-month rolling time period. The 1400 truck limit included in the draft Air Use Permit represented the average monthly number of trucks entering and leaving the facility, not the yearly amount. As Air Quality Division's review of the application was based on the yearly value, special condition No. 10.4 in the final Air Use Permit has been changed to reflect the 16,856 trucks entering and leaving the facility per 12-month rolling time period value.
- In response to comments that the fugitive dust plan did not meet the regulatory requirements of the Natural Resources Environmental Protection Act (NREPA), 324.5524 (5) because the silt content is greater than 1%, the fugitive dust plan attached to the final Air Use Permit has been updated and now includes specific language for a silt content of greater than 1%.
- In response to comments that the fugitive dust plan did not include critical items such as watering application rates or frequency, the fugitive dust plan attached to the final Air Use Permit has been updated and now includes a specified minimum watering schedule.